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Kerry D. Cochran  
P.O. Box 911  
San Bruno, Ca. 94066-0911

May 5, 1998

Office of the Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, DC. 20554

Dear Secretary

Enclosed you will find one (1) original and five (5) copies of my "Comments to a Notice of Proposed Rule Making" WT98-20

Please see that the Commission receives these comments.

Yours truly



Kerry D. Cochran

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC. 20554

In the Matter of	)	
	)	
Biennial Regulatory Review	)	WT Docket No. 98-20
Amendment of Parts 0, 1, 13,22,	)	
24, 26, 27, 80, 87, 90, 95, 97, and 101	)	
of the Commissions Rules to Facilitate	)	
the Development and Use of the Universal	)	
Licensing System in the Wireless	)	
Telecommunications Services.	)	

**Comments to a Notice of Proposed Rule Making**

Filed by:	Name:	Kerry D. Cochran
	Address:	P.O. Box 911
		San Bruno, Ca. 94066-0911

G.M.R.S. CALL SIGN      KAD 8667

Signed:



Date:

5, May 1998

## FEDERAL COMMUNICATIONS COMMISSION

My name is Kerry D. Cochran, I am a licensed G.M.R.S. (General Mobile Radio Service) user, operator, repeater owner, and repeater manager. I have been involved with G.M.R.S. and Wireless Communication for over ten years. My Call Sign is KAD 8667. Mailing Address: P.O. Box 911 San Bruno, Ca. 94066-0911

I have serious concerns over the current NPRM, WT 98-20, and the impact it will have on the G.M.R.S. users, owners, and operators.

I am opposed to the proposed Universal Licensing System and the changes to the current Parts 95 Rules and Regulations. Under the proposal the changes, if adopted, would radically alter the G.M.R.S. operations as they currently exist. The NPRM fails to acknowledge the significance of these additional proposed changes to the G.M.R.S. community.

I believe the if adopted, these radical changes in the licensing would eventually lead the FCC to again attempt to delicense this service, to which I have opposed in the past and will oppose in the future.

I as a G.M.R.S. users am concerned about the consequences of these changes, and believe that the changes will lead to harmful interference to the users, owners, and operators of G.M.R.S. systems across the country.

The significant changes in the Parts 95 rules sections 95.29, 95.47, 95.53, 95.55, 95.75, 95.59, 95.121, 95.129, 95.135, 95.173, and 95.175 and elimination of these rules would negatively affect virtually every G.M.R.S. licensee.

Repeater operators would lose control over their stations, repeater owners would need to make complex and costly changes to prevent unauthorized access to their equipment.

This would discourage a GMRS users from accessing repeaters for Emergency Communications, and/or traveler assistance.

The long-distance, hobby-type of Dxing of repeater by control stations would no longer be prohibited, repeater to repeater interference would increase.

I believe that it is critical to GMRS be self-coordination and self-regulation that the FCC continue to collect the types of information currently in the licensing database for all conventional base stations and for all repeaters.

The NPRM fails to address the issue of persons without the ability to access the FCC via a computer and/or the Internet. This deprives them the opportunity to file requests manually. This is **NOT** in the best interest of the public.

While consolidating the licensing process into one process may reduce redundant inconsistent, or unnecessary submission, this NPRM, does not address all concerns in the GMRS licensing and rules revisions areas.

While the NPRM may streamline the filing and record keeping process, of licensing, it does not eliminate the need and requirement to collect reliable licensing and ownership information that is now being collected. This current licensing requirement is of the utmost importance for GMRS operators, repeater owners and system managers to self coordinate and to cooperate in interference elimination.

The GMRS community has long sought revisions in the licensing process and submitted several suggestions to the FCC officials about how a simplified licensing system could be implemented while retaining certain policies and protection that are in the current rules.

I strongly oppose this NPRM WT 98-20, and respectfully request that it be **REJECTED** and **NOT BE APPROVED**.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry D. Cochran", written in a cursive style.

**Kerry D. Cochran**

**KAD 8667**